

**Supporting Statement
for
Plan Approval and Records for Subdivision and
Stability Regulations -- Title 46 Subchapter S
(consolidation w/ 1625-0053//2115-0585)**

A. Justification.

1) Circumstances that make the collection of information necessary.

Under the authority of the Secretary in the department in which the U. S. Coast Guard is operating, the Coast Guard administers and enforces the laws and regulations promoting the safety of life and property in marine transportation. Title 46 USC 3301 and 3305 require that every freight, seagoing motor, and steam vessel, and every seagoing barge, including a mobile offshore drilling unit be inspected to determine that it is in full compliance with applicable marine safety regulations. Title 46 USC 3306 directs the Secretary to make appropriate regulations, including standards for vessel stability. Title 46 USC 3703 directs the Secretary to prescribe additional regulations for vessels which carry liquid bulk dangerous cargoes. In addition, certain vessels must meet the standards of the Safety of Life at Sea Convention (SOLAS). Plan and vessel characteristics submissions by builders/designers and logging requirements by owners/operators are needed to assure the regulations are met.

This information collection supports the following strategic goals:

Coast Guard

- Safety
- Protection of the Natural Resources

Marine Safety, Security and Environmental Protection Directorate (G-M)

- Safety: Eliminate deaths, injuries, and property damage associated with commercial maritime operations.
- Human and Natural Environment: Eliminate environmental damage associated with maritime transportation and operations on and around the nation's waterways.

2) By whom, how, and for what purpose the information is to be used.

Requirements for the submission of plans, technical information, or operating instructions: This information is required by the Coast Guard in order to assure that a vessel meets the applicable stability standards. Plans and other information submitted are normally developed by the shipyard, designer, or manufacturer to assure the construction and safe operation of a vessel. The material and information required is not solely for Coast Guard use, although the material does contain the information necessary to meet Coast Guard regulations. Part of the submissions are nonrecurring; they are made only once at or prior to vessel construction or alteration. Duplication plans are not required to be submitted when more than one vessel is constructed to the same plans, nor is a stability test required. In this case, only a certification of sistership status by an authorized officer of the shipbuilding company is needed.

Requirements for the stability information to be available to vessel operating personnel and for the logging of stability verification: These requirements are necessary to help assure the safe operation of each vessel. There are specific requirements for the content of the stability booklet and operating manuals; however, the format will vary with vessel type. Many vessel operators provide manuals to their vessels which meet or exceed any requirements of the Coast Guard. Most, though not all of the information, is reviewed by the Coast Guard. The required operating information is required to be on board the vessel as long as the vessel remains subject to the regulations. Recordkeeping requirements will vary for each vessel type and operation and are required by the Coast Guard in order to determine if a vessel meets the appropriate stability and subdivision requirements.

3) Consideration of the use of improved information technology.

We estimate that 100% of the reporting requirements can be done electronically. At this time, we estimate that approximately 5% of the responses are collected electronically.

4) Efforts to identify duplication. Why similar information cannot be used.

The Coast Guard monitors State and local regulatory activity in this field. To date no equivalent state and local programs have been identified that require equivalent information, and no other federal agencies have similar or equivalent regulatory requirements.

5) Methods to minimize the burden to small business if involved.

It is likely that some of the companies in question would be considered small entities, however the overall impact of the requirement is minimal. Small businesses, such as independent naval architects, vessel owners and small shipyards, are favorably affected by these regulations. Subchapter S consolidates standards for all types of vessels into one set of regulations. In addition, these regulations provide clarifications to and interpretations of the previous regulations, as well as policy statements made by the Coast Guard relating to stability standards for specific vessel types, and new stability standards set by SOLAS. This enables smaller firms, such as independent naval architects, vessel owners, and smaller shipyards, to better prepare stability plans because they will have a better knowledge and understanding of the requirements. Smaller firms will also be better informed of Coast Guard policy and regulation interpretations, in the absence of the large staffs available to major organizations.

6) Consequences to the Federal program if collection were conducted less frequently.

If information was submitted or recorded less frequently, no assurance could be given that vessels are operating within the applicable stability requirements that ensure marine safety.

7) Explain any special circumstances that would cause the information collection to be conducted in a manner inconsistent with guidelines.

Not applicable. No special circumstances due to inconsistency. Owners routinely maintain all plans and approval letters throughout the life of a vessel, which is generally assumed to be 25 years.

8) Consultation.

This information collection requirements were presented for public comment in accordance with the Administrative Procedure Act.

9) Explain any decision to provide any payment or gift to respondents.

Not applicable.

10) Describe any assurance of confidentiality provided to respondents.

No particular assurance of confidentiality is provided to respondents. This information collection complies with the Privacy Act of 1974 and OMB Circular A-108. Confidentiality is promised, when requested, for information not subject to mandatory public disclosure requirements or when information is a trade secret. The basis for confidentiality is contained in regulation 49 CFR 7 (Public Availability of Information).

11) Additional justification for any questions of a sensitive nature.

No information of a sensitive nature is required in this information collection.

12) Estimates of reporting and recordkeeping hour and cost burdens of the collection of information.

The U.S. Coast Guard Marine Safety Center (MSC) and American Bureau of Shipping (ABS) handled approximately 2,095 stability reviews for 46 CFR Subchapter S. Between years 2000 and 2003, the MSC and ABS handled on average 1,515 and 580 stability reviews per year respectively. Most of the submissions of technical information is only required when a vessel is first constructed or undergoes major repair or alteration which affects vessel stability. Similarly, the information required to be posted or kept on board is provided when the vessel is constructed and remains on the vessel for its life. Most of the plans and calculations required by the Coast Guard for stability review are normally prepared by the designer or builder as part of the shipbuilding process. However, some changes and additions are necessary to comply with Coast Guard requirements.

It is assumed that 25% or 3 hours of the respondent's technical time is spent on the changes and additions to the stability plans and information that are made in order to satisfy the requirements of the Coast Guard. Using the total number of plans for Subchapter S of 2,095, the Subchapter S burden to the respondent is **6,285 hours** (2,095 plans x 3 hours/plan). Cost: 6,285 hours x \$55/hour = **\$345,675**.

The available records provide the number of plans reviewed, but not the number of respondents. Estimating the number of respondents from the number of plans submitted is difficult because of the vast differences in the respondents; an owner of a small vessel may only submit a few plans, but a major shipping company or large naval architecture firm may submit hundreds. Of the 2,095 submissions, it is assumed that the average respondent submitted 50 plans, therefore, **42 respondents are estimated** for stability related requirements.

As stated above, the estimate of the burden is based upon the estimated number of hours required to comply with Coast Guard reporting requirements, 6,285 hours plus and additional 189 hours (3% for recordkeeping requirements). **The total estimated burden is then 6,285 hours + 189 hours = 6,474 hours at a cost of \$356,070** (6,474 hours x \$55/hour).

Table 1: Total Burden and Costs

Type of Work	# of Plans	Hours Per Review	Total Hours	Cost per Response	Total Cost
Plan & Technical Submissions	2,095	3.0	6,285	\$55	\$345,675
Recordkeeping requirements	N/A	N/A	189	\$55	\$10,395
TOTAL	2,095	3.0	6,474		\$356,070

13) Estimates of annualized capital and start-up costs.

Not applicable.

14) Estimates of annualized Federal Government costs.

The federal burden covered by this supporting statement is borne by the Coast Guard's Marine Safety Center. This office is responsible for the review and processing of vessel plans and technical submissions. The cost of technical review for current Subchapter S submittals has been calculated by estimating the total number of hours of technical time required for the stability review of each vessel and multiplying it by the cost per hour of technical time (which based on *Commandant Instruction 73101.1F* for a Lieutenant is \$43/hour). The total number of Subchapter S reviews handled by MSC on average per year is 1,515. We assume that each review takes 4.5 hours. Therefore, the burden and cost associated with Subchapter S review is 6,819 hours (1,515 x 4.5 hours) at a cost of \$293,217 (14,625 x \$43).

The cost of clerical work for current Subchapter S submittals has been calculated by estimating the total number of hours of clerical work for stability review (2% of the total plan review time). At a unit labor cost of \$22 per hour (which is the hourly rate for an E-4 according to *Commandant Instruction 73101.1F*), the clerical cost is: 136 hours (6,819 technical hours x 2% for clerical time spent on stability) x \$22/hour = \$2,992.

Therefore, the total estimated Federal Government burden is 6,955 hours at a cost of \$296,209.

Table 2: Total Burden and Cost to Federal Government

Type of Work	Number of Reviews	Hours Per Review	Total Hours	Cost per Hour	Total Cost
Technical	1,515	4.50	6,819	\$43	\$293,217
Clerical	Same as above	0.09	136	\$22	\$2,992
TOTAL	1,515		6,955		\$296,209

15) Explain the reasons for the change in burden.

The change in burden is an ADJUSTMENT due to a decrease in the annual number of Subchapter S plans and calculations submitted for stability review. The number of plans have decreased from 3,250 to 2,095 annually.

16) For collections of information whose results are planned to be published for statistical use, outline plans for tabulation, statistical analysis and publication.

There are no plans to publish information for statistical use.

17) Explain the reasons for seeking not to display the expiration date for OMB approval of the information collection.

Not applicable.

18) Explain each exception to the certification statement.

Not applicable.

B. Collection of Information Employing Statistical Methods.

Not applicable.